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June 28, 2006

**BY ELECTRONIC FILING AND U.S. MAIL**

Elizabeth A. French, Clerk  
U.S. District Court  
District of Massachusetts  
1550 Main Street  
Springfield, MA 01103

Re: Plasse vs. Tyco Electronics Corporation  
Civil Action No.: 04-CV-30056-MAP  
Response to Defendant's Letter of June 16, 2006

Dear Ms. French:

The Defendants have submitted a letter dated June 16, 2006 regarding the recent Massachusetts Superior Court case of *Covucci v. Keane Consulting Group, Inc.* The Plaintiff has the following response to the Defendant's citation of this case.

Defendant's reference to the *Covucci* case only serves to highlight the absence of evidence for their claims in the motion to dismiss. In *Covucci*, the Plaintiff admittedly lied about the existence of the computer itself and used deletion software to wipe the relevant computer clean. Here, in contrast, the Defendant's own expert's report shows that no relevant document was edited or created at the time the Defendants claim there was forgery. A second Defendant document expert found no evidence that the document was forged. There was no evidence of use of any deletion software in this case. Furthermore, *Covucci*, like all of the other cases cited by the Defendant, concerns fraudulent evidence on substantive matters directly relevant to the heart of the cause of action, matters that are significant enough to suggest a motive for tampering. Here, in contrast, we are only discussing an issue which, if relevant at all, would only go to the question of damages.

Sincerely,

*Maurice M Cahillane / gm*

Maurice M. Cahillane

cc: Jeffrey D. Clements, Esquire

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